

Suspect/Counterfeit Items Program At Sandia National Laboratories

Sandia is responsible for complying with the requirements of DOE Order 414.1B, Quality Assurance, and Title 10 Code of Federal Regulations (CFR) 830.120, (Quality Assurance for nuclear facilities). Sandia is also responsible for flowing down these requirements to subcontractors at any tier to the extent necessary to ensure subcontractors comply with these requirements and “only incur costs that would be incurred by a prudent person in the conduct of competitive business.”

The DOE Order includes a requirement for a Suspect/Counterfeit Items (S/CI) prevention process that:

- Prevents the introduction and use of S/CIs through engineering involvement, design, procurement, testing, inspection, maintenance, evaluation, disposition, reporting, trend analysis, and removal of S/CIs;
- Conducts a training program to inform managers, supervisors, and workers on S/CI processes and controls;
- Identifies and disposes of S/CIs on site; and
- Restricts S/CI use to only those items that have been found acceptable through engineering analysis and formal disposition processes.

An S/CI program was established to prevent the unnecessary introduction of suspect/counterfeit items at Sandia. Imitations might appear the same but may not meet specifications and could ultimately fail if applied to a critical application.

S/CI Program Objectives:

- Ensure that items intended for use in safety or critical systems comply with design and procurement documents;
- Maintain current, accurate information on S/CIs and associated suppliers using all available resources within the government and industry;
- Identify, control, and dispose of S/CIs that create potential hazards in safety-significant systems and applications;
- Report discoveries of and disseminate information about S/CIs; and
- Train and inform appropriate Sandia personnel of S/CI controls.

What are suspect or counterfeit items?

An item should be considered suspect if, after visual inspection, testing, or other information, it does not conform to specification or national consensus standards. A counterfeit item is a suspect item that has been substituted for another without any legal right or authority to do so and which has been knowingly misrepresented by the vendor, supplier, distributor, or manufacturer, in which case it is a fraudulent attempt to deceive the customer.

A nonconforming item is not always suspect/counterfeit if the nonconformity results from:

- Defects resulting from inadequate design or production quality control;
- Damage during shipping, handling, or storage;
- Improper installation;
- Normal deterioration during service;
- Degradation during removal;
- Failure resulting from aging; or
- Other controllable causes.

For more information on Sandia's S/CI program, contact Betty Fleming at 845-9966.